IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 05-71

v. : DATE FILED: April 14, 2005

ANGEL LUIS PEREZ, : VIOLATIONS:

a/k/a "Tetine," 21 U.S.C. § 846 (conspiracy to distribute EDGARDO MATEO : and possess with the intent to distribute

ROBERT ROSS, cocaine - 1 count)

a/k/a "Bob," : 21 U.S.C. § 841(a)(1) (distribution of

FELIX PEREZ-REYES, cocaine - 7 counts)

a/k/a "Junior," : 21 U.S.C. § 841(a)(1) (possession with ISMAEL GONZALEZ intent to distribute cocaine - 18 counts)

CHAD HERR : 18 U.S.C. § 2 (aiding and abetting)
JOSEPH GLACKIN : 21 U.S.C. § 853 (notice of criminal

JESUS SANTANTA, : forfeiture)

a/k/a "Pete Santana,"

WILFREDO RIVERA

WILLIAM C. ROSS, JR.

JAMES M. MORANT :

JOSE SAMPLE

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about June 2002, through in or about January 13, 2005,

in the Eastern District of Pennsylvania and elsewhere, defendants

ANGEL LUIS PEREZ,
a/k/a "Tetine,"
EDGARDO MATEO
ROBERT ROSS,
a/k/a "Bob,"
FELIX PEREZ-REYES,
a/k/a "Junior,"
ISMAEL GONZALEZ, and
CHAD HERR

conspired, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with the intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

- 2. It was part of the conspiracy that defendants ANGEL LUIS PEREZ, a/k/a "Tetine," and EDGARDO MATEO, and others known and unknown to the grand jury, obtained cocaine from various sources in New York and Puerto Rico.
- 3. It was further part of the conspiracy that defendant ANGEL LUIS PEREZ, a/k/a "Tetine," ROBERT ROSS, a/k/a "Bob," FELIX PEREZ-REYES, a/k/a "Junior," ISMAEL GONZALEZ, CHAD HERR, and others known, and unknown to the grand jury traveled from the area of Lancaster, Pennsylvania to New York and Reading, Pennsylvania to obtain kilogram quantities of cocaine, and distributed the cocaine in and around Lancaster and Harrisburg, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

- 1. In or about July 2002, defendant ANGEL LUIS PEREZ supplied an unindicted coconspirator with 400 to 500 grams of cocaine on multiple occasions.
- 2. In or about September 2002, defendants ANGEL LUIS PEREZ, FELIX PEREZ-REYES and two unindicted coconspirators traveled from the Lancaster, Pennsylvania

area to New York with approximately \$600,000 and purchased approximately 65 kilograms of cocaine. The cocaine was loaded into the vehicle that defendants ANGEL LUIS PEREZ, FELIX-PEREZ-REYES and the two unindicted coconspirators traveled to New York in, then the vehicle was loaded onto a flatbed tow truck, and driven from New York to a garage maintained by defendant PEREZ in the area of Lancaster, Pennsylvania. Defendants ANGEL LUIS PEREZ, FELIX PEREZ-REYES, and the two unindicted coconspirators hired a limousine in New York, accompanied the tow truck from New York to a garage in the Lancaster, Pennsylvania area, and unloaded the cocaine from the vehicle once it was taken off the tow truck.

- 3. In or about July 2004, defendant ANGEL LUIS PEREZ was in possession of one kilogram of cocaine.
- 4. On or about November 4, 2004, defendant ANGEL LUIS PEREZ distributed approximately 13 grams of cocaine for \$380.
- On or about November 9, 2004, defendant ANGEL LUIS PEREZ distributed approximately one ounce of cocaine for \$600 at Fremont Street, Lancaster, Pennsylvania.
- 6. On or about December 2, 2004, defendant ANGEL LUIS PEREZ traveled from the Lancaster, Pennsylvania area to New York, New York and delivered approximately \$14,000 to a cocaine source as partial payment for a kilogram of cocaine that defendant ANGEL LUIS PEREZ was waiting to receive.
- 7. On or about December 6, 2004, defendant ANGEL LUIS PEREZ drove a Hummer, bearing Pennsylvania registration number FGG9579, registered to N.P., a person known to the grand jury, on Steeplechase Road, Landisville, Pennsylvania, to deliver one-half ounce of

cocaine to Joseph Glackin, charged in Count Five, at a restaurant near Lancaster, Pennsylvania.

- 8. On or about December 13, 2004, defendant ANGEL LUIS PEREZ traveled from Lancaster, Pennsylvania to New York, New York, in a green Ford Taurus, with a hidden compartment, bearing Pennsylvania registration number FLP4205, registered to N.P., Steeplechase Road, Landisville, Pennsylvania, where defendant ANGEL LUIS PEREZ met with defendant EDGARDO MATEO. Defendants ANGEL LUIS PEREZ and EDGARDO MATEO traveled to a location in Manhattan, New York and obtained one kilogram of cocaine for approximately \$24,000.
- 9. On or about December 13, 2004, defendant ANGEL LUIS PEREZ distributed approximately 500 grams of cocaine to Jesus Santana, a/k/a "Pete Santana," charged in Counts 7, 19 and 22, and approximately 250 grams of cocaine to Wilfredo Rivera, charged in Counts 8 and 26.
- 10. On or about December 14, 2004, defendant FELIX PEREZ-REYES, at the direction of defendant ANGEL LUIS PEREZ, obtained approximately eight ounces of cocaine from an apartment on East Front Street, Marietta, Pennsylvania, and delivered it to defendant ANGEL LUIS PEREZ.
- 11. On or about December 14, 2004, defendant ANGEL LUIS PEREZ distributed approximately four ounces of cocaine inside Fremont Street, in Lancaster, Pennsylvania.
- 12. On or about December 15, 2004, defendant ANGEL LUIS PEREZ distributed approximately two ounces of cocaine to James M. Morant, charged in Counts 13 and 17, in the Manheim, Pennsylvania area.

- 13. On or about December 19, 2004, defendant ANGEL LUIS PEREZ met with defendant ISMAEL GONZALEZ to travel to Reading, Pennsylvania to pick up at least one kilogram of cocaine.
- 14. On or about December 19, 2004, defendant ANGEL LUIS PEREZ contacted defendant ROBERT ROSS and advised that he (PEREZ) had obtained at least a kilo and defendant ROBERT ROSS advised defendant ANGEL LUIS PEREZ to bring the kilo to defendant ROBERT ROSS' house in Landisville, Pennsylvania.
- 15. On or about December 19, 2004, defendant ROBERT ROSS distributed approximately one kilogram of cocaine to William C. Ross, Jr., charged in Count 12.
- 16. On or about December 19, 2004, defendant ANGEL LUIS PEREZ distributed approximately 10 ounces of cocaine to James M. Morant.
- 17. On or about December 20, 2004, defendants ANGEL LUIS PEREZ and defendant FELIX PEREZ-REYES traveled from Lancaster, Pennsylvania to defendant ISMAEL GONZALEZ's residence on 19th Street, Harrisburg, Pennsylvania to deliver approximately \$24,500 as payment for the cocaine that defendant GONZALEZ had orchestrated, and which he and defendant ANGEL LUIS PEREZ had obtained in Reading, Pennsylvania on or about December 19, 2004.
- 18. On or about December 20, 2004, defendant ANGEL LUIS PEREZ negotiated the sale of one ounce of cocaine to Jose Sample, charged in Count 15. During the negotiations, Sample complained that all of the three prior cocaine deliveries he received from defendant ANGEL LUIS PEREZ had been two grams short.
 - 19. On or about December 20, 2004, defendant ANGEL LUIS PEREZ

distributed one ounce of cocaine to Jose Sample. Sample transported the cocaine in a BMW bearing Pennsylvania registration number FGG2300, registered to himself at Duke Street, Lancaster, Pennsylvania.

- 20. On or about December 21, 2004, defendant FELIX PEREZ-REYES, at the direction of defendant ANGEL LUIS PEREZ, delivered approximately two ounces of cocaine to James M. Morant.
- 21. On or about December 28, 2004, defendant ANGEL LUIS PEREZ took orders for two ounces of cocaine from Joseph Glackin and an order for one ounce of cocaine from Jose Sample.
- 22. On or about December 28, 2004, defendant ANGEL LUIS PEREZ distributed approximately one ounce of cocaine to Jose Sample.
- 23. On or about December 30, 2004, defendants ANGEL LUIS PEREZ and ROBERT ROSS traveled in PEREZ's green Ford Taurus, to New York, New York where they obtained one kilogram of cocaine for approximately \$22,500.
- 24. On or about December 31, 2004, defendant ANGEL LUIS PEREZ distributed approximately 500 grams of cocaine to Jesus Santana.
- 25. On or about January 12, 2005, defendants, ANGEL LUIS PEREZ, ROBERT ROSS and CHAD HERR traveled in a Dodge Viper, Pennsylvania registration number FVY9641, registered to Robert Ross, Stony Battery Road, Landisville, Pennsylvania, to make a delivery of cocaine in the Lancaster area.
- 26. On or about January 13, 2005, defendants ANGEL LUIS PEREZ and CHAD HERR picked up approximately \$11,000 from defendant ISMAEL GONZALEZ in

Harrisburg, Pennsylvania, drove to New York and picked up approximately two kilograms of cocaine from defendant EDGARDO MATEO, and transported the cocaine to the Lancaster, Pennsylvania area.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally distributed approximately 13 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 9, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally distributed approximately one ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally distributed approximately one-half ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2004, in the Eastern District of Pennsylvania, defendant

JOSEPH GLACKIN

knowingly and intentionally possessed with the intent to distribute approximately one-half ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2004, in the Eastern District of Pennsylvania, defendant

JESUS SANTANA, a/k/a "Pete Santana,"

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2004, in the Eastern District of Pennsylvania, defendant

WILFREDO RIVERA

knowingly and intentionally distributed approximately 250 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally distributed approximately eight ounces of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally distributed approximately two ounces of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine," and ISMAEL GONZALEZ

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2004, in the Eastern District of Pennsylvania, defendants

ROBERT ROSS, a/k/a "Bob," and WILLIAM C. ROSS, JR.

knowingly and intentionally distributed more than 500 grams, that is approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2004, in the Eastern District of Pennsylvania, defendant

JAMES M. MORANT

knowingly and intentionally possessed with the intent to distribute approximately ten ounces of a mixture or substance containing a detectable amount cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a mixture or substance containing a detectable amount cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2004, in the Eastern District of Pennsylvania, defendant

JOSE SAMPLE

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a mixture or substance containing a detectable amount cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 21, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute approximately two ounces of a mixture or substance containing a detectable amount cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 21, 2004, in the Eastern District of Pennsylvania, defendant

JAMES M. MORANT

knowingly and intentionally possessed with the intent to distribute approximately two ounces of a mixture or substance containing a detectable amount cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2004, in the Eastern District of Pennsylvania, defendant

JESUS SANTANA, a/k/a "Pete Santana,"

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 30, 2004, in the Eastern District of Pennsylvania,

defendants

ANGEL LUIS PEREZ, a/k/a "Tetine," and ROBERT ROSS, a/k/a "Bob,"

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 31, 2004, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 31, 2004, in the Eastern District of Pennsylvania, defendant

JESUS SANTANA, a/k/a "Pete Santana,"

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

EDGARDO MATEO

knowingly and intentionally distributed more than 500 grams, that is, approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

ANGEL LUIS PEREZ, a/k/a "Tetine,"

knowingly and intentionally possessed with the intent to distribute approximately 150 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

ROBERT ROSS, a/k/a "Bob,"

knowingly and intentionally possessed with the intent to distribute approximately 142.8 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

WILFREDO RIVERA

knowingly and intentionally possessed with the intent to distribute approximately 64.7 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

NOTICE OF CRIMINAL FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this Superseding Indictment, defendants

ANGEL LUIS PEREZ, a/k/a "Tetine" **EDGARDO MATEO** ROBERT ROSS, a/k/a "Bob" FELIX PEREZ-REYES, a/k/a "Junior" ISMAEL GONZALEZ **CHAD HERR** JOSEPH GLACKIN JESUS SANTANA, a/k/a "Pete Santana" WILFREDO RIVERA WILLIAM C. ROSS, JR. JAMES M. MORANT and **JOSE SAMPLE**

shall forfeit to the United States:

- (a) Any property constituting, or derived from, proceeds obtained as the result of such violations, and,
- (b) Any property used, or intended to be used, to commit, or to facilitate the commission of such violations, including, but not limited to the following:
 - (1) Monies received as a result of the distribution of cocaine;
 - (2) Real property located at 425 Fremont Street, Lancaster,

Pennsylvania;

(3) Real property located at 740 Stony Battery Road, Landisville,

Pennsylvania;

- (4) A 2003 Hummer, VIN 5GRGN23U13H139567, bearing Pennsylvania registration number FGG9579;
- (5) A 2000 Dodge Durango truck, VIN 184HS28NOYF253642, bearing Pennsylvania registration number ETX4744;
- (6) A 2000 BMW, VIN WBABM5342YJP03093, bearing Pennsylvania registration number FGG2300;
- (7) A 1996 Cadillac sedan, VIN 1G6KD52Y8TU245755, bearing Pennsylvania registration number FRM8826;
- (8) A 1999 Dodge Viper, VIN 1B3ER79E3XV503419, bearing Pennsylvania registration number FVY9641.
- 2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred, sold to, or deposited with, a third person;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to

seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

	A TRUE BILL:
	GRAND JURY FOREPERSON
PATRICK L. MEEHAN United States Attorney	